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9 Attorney for Debtor

10 **UNITED STATES BANKRUPTCY COURT**  
11 **DISTRICT OF NEVADA**

12 In re:

CASE NO. BK-N-18-50897-BTB  
Chapter 13

13 STEVEN M. WALDREN,

14 Debtor.

**DECLARATION OF STEVEN M.**  
**WALDREN IN SUPPORT OF**  
**OPPOSITION TO HMC ASSETS, LLC'S**  
**MOTION TO DISMISS**

Hearing Date: November 1, 2018  
Hearing Time: 3:00 p.m.

15 \_\_\_\_\_ /  
16 STEVEN M. WALDREN, under penalty of perjury, states as follows:

17 1. I am the Debtor in this Chapter 13 bankruptcy case, which was filed on August 14,  
18 2018.

19 2. I live at 480 Hay Bale Drive through his Chapter 13 bankruptcy (the "Hay Bale  
20 Property").

21 3. Prior to filing this Chapter 13 bankruptcy case, I defaulted on my mortgage for the  
22 Hay Bale Property, which resulted in a notice of default starting the foreclosure process. I tried to  
23 mediate a resolution of the mortgage through the State of Nevada Mediation Program, but was not  
24 successful. However, my income has increased since the time I applied for the modification through  
25 the mediation program. I believe my increased income will qualify me for a loan modification.

26 4. The goal of my Chapter 13 is to obtain a loan modification on the Hay Bale Property.  
27 However, I may decide to cure the mortgage if I am not able to reach a modification with my lender.

28 5. I have already enrolled to participate in the Chapter 13 Mortgage Modification

1 Mediation Program and I understand that process is proceeding as required.

2 6. I do not believe that I misrepresented any facts in my bankruptcy petition or my  
3 plan. I have been honest and forthcoming with this Court, my creditors and the Chapter 13 Trustee.

4 7. The primary reason for the filing of my case was to save my home from foreclosure.

5 8. I have no history of filing a bankruptcy case prior to this case, so I have never had a  
6 prior bankruptcy case dismissed.

7 9. This case was not filed to defeat state court litigation. There is no state court  
8 litigation pending against me.

9 DATED this 18<sup>th</sup> day of October 2018.

10  
11 /s/ Steven M. Waldren

12 By: \_\_\_\_\_

13 STEVEN M. WALDREN  
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